

**PEOPLE FOR THE ETHICAL  
TREATMENT OF ANIMALS, INC.,**

**Movant,**

**V.**

# DEYOUNG FAMILY ZOO

**Respondent.**

**Case No. 4:18-mc-00798-CDP**

## DECLARATION OF JARED GOODMAN

Pursuant to 28 U.S.C. § 1746, I, Jared Goodman, declare the following to be true and correct to the best of my knowledge and belief:

1. I am counsel for People for the Ethical Treatment of Animals, Inc. (“PETA”) and Angela Scott, the counterclaimants in the matter *Missouri Primate Foundation et al. v. People for the Ethical Treatment of Animals, Inc.*, No. 4:16-cv-02163-CDP, pending in the U.S. District Court for the Eastern District of Missouri (the “MPF Litigation”), and to PETA in the instant action. I make this declaration based upon my personal knowledge and upon information available to me as PETA’s and Scott’s counsel.

2. On October 28, 2016, PETA served DeYoung Family Zoo (the “Zoo”) notice of its intent to file suit under the Endangered Species Act, due, in large part, to the Zoo’s isolation of its two chimpanzees. A true and correct copy of this notice is attached as attached hereto as **Exhibit A**.

3. On March 24, 2017, Plaintiffs sent a letter to Kurtis B. Reeg, then-counsel for the Zoo, stating that Plaintiffs would not file suit under the Endangered Species Act pursuant to its

October 28, 2016, notice based on the Zoo's claims that it had addressed the issues PETA listed in that notice letter. PETA could not independently verify whether or not those issues had been addressed, as the chimpanzees were not on public display. A true and correct copy of the March 24, 2017, letter is attached hereto as **Exhibit B**.

4. PETA took the deposition of MPF Litigation Counterclaim Defendant Connie Braun Casey on October 29, 2018. During the deposition, she repeatedly referred questions about the chimpanzees at issue in the subpoenas to the Zoo. A true and correct copy of the relevant pages of the deposition testimony is attached hereto as **Exhibit C**.

I declare under the penalty of perjury that the foregoing is true and correct.

January 17, 2019

Los Angeles, CA

/s/ Jared Goodman  
Jared Goodman